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March 5, 1993

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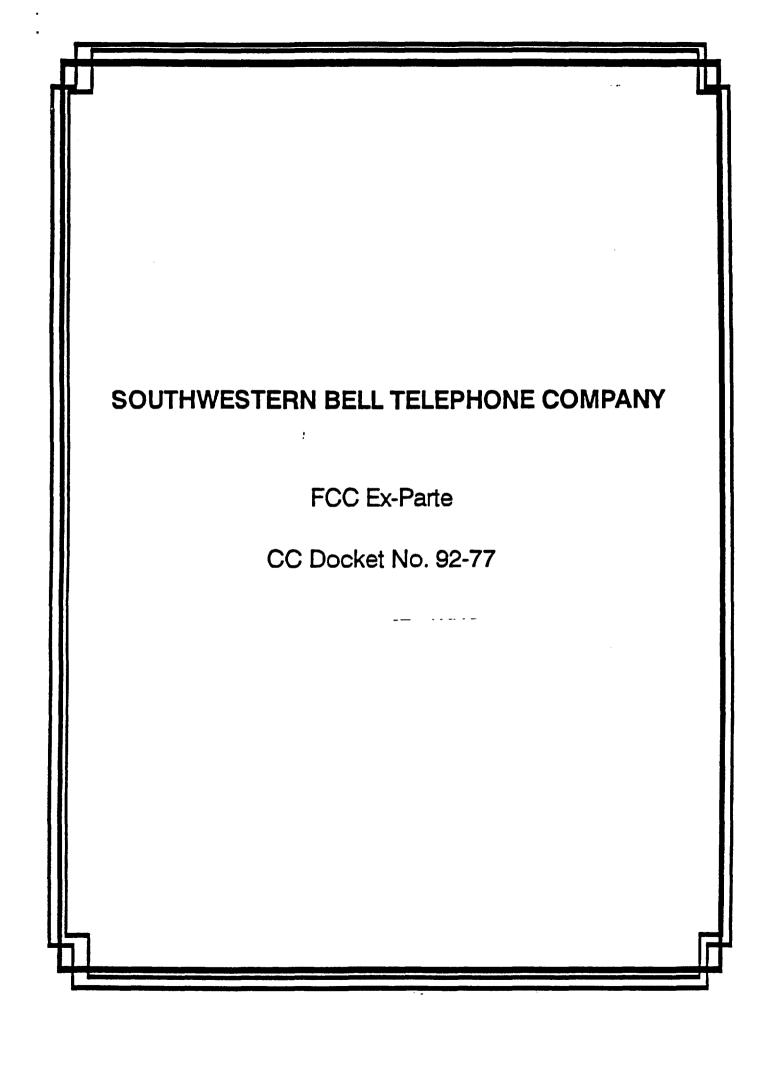
FEDERAL COMMUNICATION'S COMMISSION OFFICE OF THE SECRETARY

Ex Parte

William A. Blase, Jr. Director Federal Regulatory

Ms. Donna Searcy, Secretary Federal Communications Commission 1919 M Street, N.W. Room 222 (1170) Washington, D.C. 20554

CC Docket No. 92-77/ Phase I and II



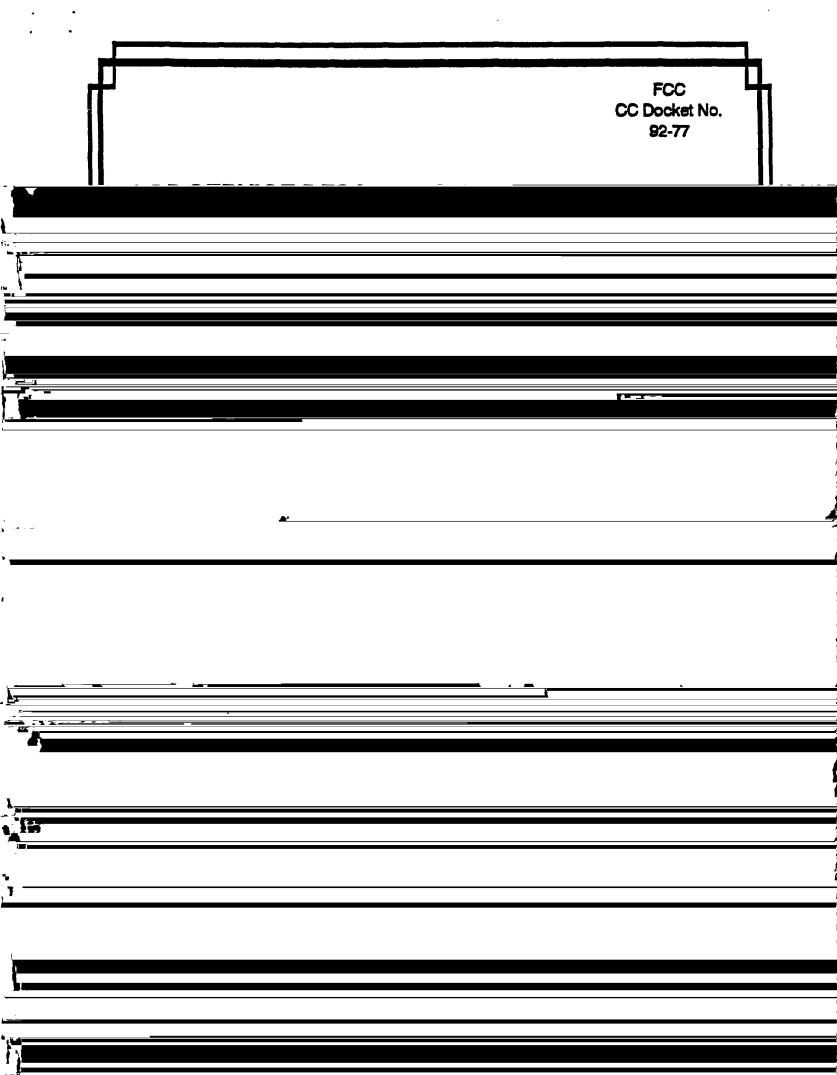
CC DOCKET 92-77 TOPICS:

Billed Party Preference (92-77 - Phase II)

- Service Description
- Service Benefits
- Service Design
- IXC Participation
- Implementation Costs
- Cost Recovery
- Implementation Intervals

0+ Public Domain (92-77 - Phase I)

- Commission Decisions
- Impacts
- SWBT PFR



BPP SERVICE BENEFITS

- ADDRESSES CUSTOMER SERVICE ISSUES
 - Dialing convenience
 - Billed (paying) party determines IXC
 - Originating customer chooses billing mechanism
 - IXC/OSP rates
 - IXC/OSP practices
- ACCOMPLISHES THE STATED GOALS OF THE COMMISSION
 - "free customers from charges they did not agree to"
 - "free customers from practices that prevent them from using the Operator Service Provider (OSP) of their choice"

BPP SERVICE BENEFITS (Cont'd)

- ACCOMPLISHES THE STATED GOALS OF THE COMMISSION (Cont'd)
 - "foster a marketplace environment in which operator service providers compete based on merits of their service, rather than on commission payments"
- STIMULATES COMPETITION IN THE INTEREXCHANGE AND CALLING CARD MARKETS
 - O+ dialing will be extended to all IXCs-market place parity for network access and card usage
 - 0+ interLATA calling from all phones
 - Facilitates mutual card honoring arrangements between LECs and IXCs

BPP SERVICE DESIGN

Summary of Dialing Plan and Carrier ID

Dial Code	Destination			
(InterLATA Only)	1+PIC	Dialed (xxx) IC	LEC OSS	
10XXX+1+ 10XXX+0(+ 10XXX+01+ 10XXX+011	+	N N N N N N N N N N N N N N N N N N N		
1+ 011+ 00-	N N N			
0+ 0-	С		B N ¹	
01+	С		В	:

Legend:

N = No Change (Current & BPP)

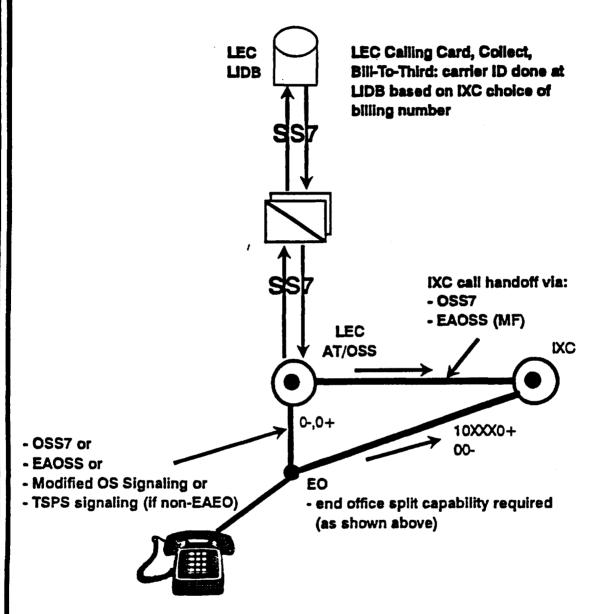
N¹ = No Change (Current & BPP) Except for "Redialed" 0- Traffic

C = Current

B = BPP

BILLED PARTY PREFERENCE

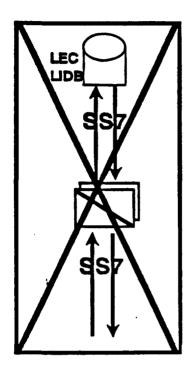
FCC CC Docket No. 92-77



BPP Call Scenarios (InterLATA Calls):

LEC Calling Card: 0+10D <BONG> NPA-NXX-XXXX-PINN Collect: 0+10D <BONG> "collect billing information" Bill-To-Third: 0+10D <BONG> "bill-to-third billing information"

BILLED PARTY PREFERENCE FCC CC Docket No. 92-77



IXC call handoff via:

- OSS7
- EAOSS (MF)

891 & CIID: carrier ID done at OSS based on instuctions from IXC card issuer

- OSS7 or
- EAOSS or
- Modified OS Signaling or
- TSPS signaling (if non-EAEO)

0-,0+ 10XXX0+ 00-

EO

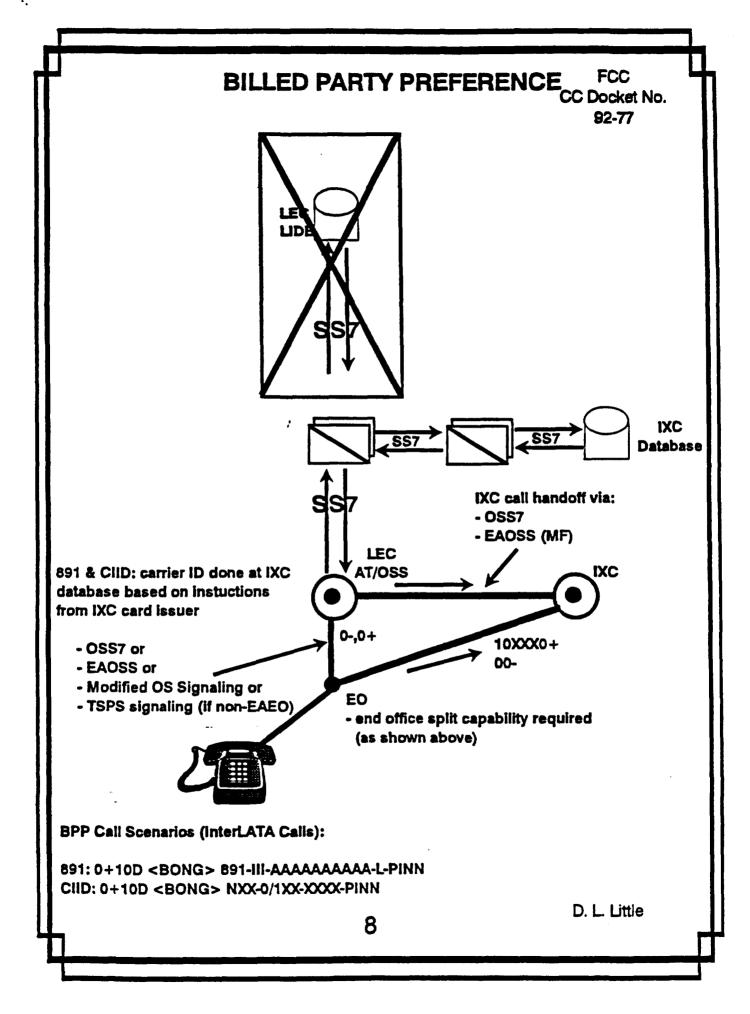
 end office split capability required (as shown above)



BPP Call Scenarios (InterLATA Calls):

891: 0+10D <BONG> 891-III-AAAAAAAAAA-L-PINN

CIID: 0+10D <BONG> NXX-0/1XX-XXXX-PINN



BPP IXC PARTICIPATION

- KEY SWBT ASSUMPTIONS
 - IXC ABS Calls Are 64% of Total ABS Market
 - IXC ABS Call Mix and Automation Acceptance Equal to SWBT Experience
- IXC REQUIREMENTS
 - Promote 0+ Dialing
 - Issue Cards in CIID or 891 Formats
- SWBT SENSITIVITY ANALYSIS
 - Declining % Access Code Dialing by all IXCs
 - Declining % Access Code Dialing by all IXCs except AT&T; AT&T Equal 20%
 - Declining % Access Code Dialing by all IXCs except AT&T; AT&T Equal 50%

BPP IMPLEMENTATION COSTS

- SWBT Estimates BPP Will Require \$161M to Implement for its Service Areas (SWBT Reply Comments August 27, 1992)
 - Primary Non-Recurring Capital Cost Components
 - ▲ End-Office Signaling Upgrades
 - AABS System Changes
 - ▲ Trunk Terminations and Rearrangements
 - Primary Non-Recurring Expense Cost Components
 - ▲ LIDB Load
 - ▲ Customer Solicitation
 - ▲ End-Office Signaling Upgrades
 - OSS Signaling Upgrades
 - OSS BPP Feature Functionality
 - AABS System Changes
 - Primary Recurring Expense Cost Component
 - ▲ Operator Wages

BPP COST RECOVERY

- IXC Service Participation is Critical
- Cost Recovery Structure Should Discourage Continued Access Code Dialing
- FCC has Indicated "New Service" Treatment
- Views of State Commissions are Needed

BPP IMPLEMENTATION INTERVALS (STANDARD CASE)

Milestone/Activity	Projected Date
--------------------	-----------------------

FCC Order 7-1-93

(18 months)

Vendor Trial 1-1-95

(FOA/VO)

(6 months)

Vendor General 7-1-95

Availability

(12 months)

Industry Implementation 7-1-96

Complete

Total "Standard Case" 36 Months

Months Required From

FCC Order

0+ PUBLIC DOMAIN (92-77 - PHASE I)

DEFINITION

"any carrier issuing a calling card designed to be used with "0+" access would be required to also provide validation and billing service for any other carrier wishing to accept that card" (i.e., "0+" cards would be in the "public domain").

COMMISSION DECISIONS

- Did not require 0+ Public Domain Implementation
- Ordered AT&T to instruct its card customers to dial calls using 10288+0 access

0+ PUBLIC DOMAIN (92-77 - PHASE I) (Cont'd)

IMPACTS

- Commission Actions Produce Same Effects as Implementation of 0+ Public Domain Without Requiring 0+ IXC Card Issuers To Make Data Available
- **■** Customer Confusion
- Negative Impacts to Mutual Card Honoring Arrangements
- Customer Dissatisfaction/Confusion

SWBT PFR

- Requests Commission to Modify its
 Instructions to AT&T Regarding Customer
 Education Materials
 - ▲ Telephone must not be presubscribed to AT&T in order to Bill Local and IntraLATA Calls to AT&T Cards
 - Customer Need Not Only Listen for "AT&T" in order to place Local and IntraLATA Calls